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 SORENSEN,G.C. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, revising TS 4.0.2 to
 remove 3.25 limit on extending surveillance intervals.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

October 27, 1989
G02-89-200

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
4.0.2, REMOVAL OF THE 3.25 LIMIT ON EXTENDING
SURVEILLANCE INTERVALS**

Reference: Generic Letter 89-14, "Removal of the 3.25 Limit
on Extending Surveillance Intervals" dated 8/21/89

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101 the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications and Bases. Specifically, the Supply System is requesting the subject section and Bases be modified, as attached, to remove the 3.25 time interval limit in accordance with the guidance provided by the Staff in the referenced generic letter.

Specification 4.0.2 of the Technical Specifications permits surveillance intervals to be extended up to 25 percent of the specified interval to facilitate the scheduling of surveillance activities. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

The Staff in the referenced generic letter recognized that the 3.25 limit could arbitrarily require a plant to perform a surveillance test under conditions unsuitable for performing the test or cause a forced shutdown. The Staff noted that the risk to safety due to extending the surveillance interval without regard to the 3.25 limit "is low in contrast to the alternative of a forced shutdown". Both issues, performing surveillances under less than optimum conditions and forced shutdowns based on maintaining the 3.25 limit clearly demonstrate the desirability of this change. The Supply System has reviewed the generic letter and the conclusions made by the Staff, concurs with the conclusions and is submitting this change in accordance with the Staff's guidance. Approval of this amendment request will enhance plant safety and decrease the administrative burden of ensuring compliance to the present 3.25 limit.

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REQUEST FOR AMENDMENT TO TS 4.0.2, REMOVAL OF THE
3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

The Supply System has evaluated this amendment request per 10CFR 50.92 and has determined that it does not represent a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because any slight enhancement in the reliability of the equipment that might be realized by adhering to the 3.25 limitation is thought to be significantly offset by the forced need to perform the surveillance recognizing that the 25 percent limit remains in place. The use of the allowance to extend surveillance intervals by 25 percent and not observe the 3.25 limit will result in a decreased probability of an evaluated accident over the plant lifetime because surveillance intervals will be extended at times when conditions are not suitable for performing the surveillance. Testing at unsuitable times or forced shutdowns offer the potential for a condition that would challenge plant safety systems and unnecessarily burden plant personnel. Because a vast majority of surveillances demonstrate that systems or components are in fact operable, this amendment enhances plant safety and does not adversely impact the consequences of an accident.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Because this amendment addresses only the scheduling of surveillance activities and involves no alteration of plant design or operating procedures there is no possibility of creating a new type of accident.
- 3) Create a significant reduction in a margin of safety because the more important 25 percent limit is being retained. As discussed in the generic letter, this change to the requirements of Specification 4.0.2 will remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety. The Supply System agrees with this conclusion and recognizes this change as an enhancement to the margin of safety.

As discussed above, the Supply System considers that this change does not involve a significant hazards consideration. Further, the change has no potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9) and therefore, per 10CFR 51.22(b), an environmental assessment of the change is not required.

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REQUEST FOR AMENDMENT TO TS 4.0.3, REMOVAL OF THE
3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

This amendment request has been reviewed and approved by the WNP-2 Plant Operating Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB). In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
C Eschels - EFSEC

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amend to TS 4.0.2 Removal
of 3.25 limit on Surv. Intervals


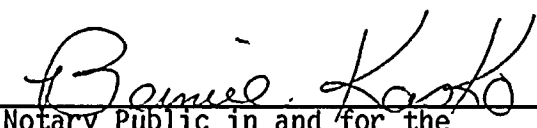
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE 27 Oct, 1989


G. C. SORENSEN, Manager
Regulatory Programs

On this day personally appeared before me G. C. SORENSEN to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 27th day of October, 1989.



Notary Public in and for the
State of Washington

Residing at Kennecott, WA